

*Environmental Impact Statement for the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region*, June 1995). All known cavity trees in CNF 58 are located within 1000 feet of the proposed Alternative 3 corridor - the closest is within 300 Feet.

The EA acknowledges that indirect impacts are also important, i.e., it will become impossible for the U.S. Forest Service to carry out prescribed burning in RCW habitat which is essential to maintain the suitability of this habitat for use by RCWs. This affects land that will be isolated (= lies inside of) by the constructed bypass. In fact, the EA frequently underscores this fact by stating that the U.S. Forest Service intends to dispose of all lands isolated by the constructed bypass (e.g., page 4-38). It will also affect non-isolated lands within close proximity of the bypass. This situation applies to the RCW colony E02 (the one that lies on U.S. Forest Service land that will become isolated by construction of the bypass) and CNF 58, *Red-cockaded Woodpecker Assessment: Havelock Bypass US 70 (R-1015), Craven County, North Carolina* (Appendix B).

The above impacts are important because they affect lands within a U.S. Forest Service designated RCW Habitat Management Area (see *Final Environmental Impact Statement For the Management of the Red-cockaded Woodpecker and its Habitat on National Forests in the Southern Region*) - a fact that the Havelock Bypass EA fails to mention. The EA also fails to identify the Management Intensity Level (MIL) designated for the RCW population that occupies the HMA. Therefore, the EA also fails to evaluate the level of risk to the population if CNF 58 is extirpated by impacts, direct & indirect, associated with the project.

In our opinion, the preferred alternative poses a direct threat to the viability of CNF 58 as a result of clearing within close proximity of 8 cavity trees. The preferred alternative will clearly impact the red-cockaded woodpecker by preventing the U.S. Forest Service from managing important habitat associated with CNF 58 and the CNF E02. This will harm the species by allowing some of its habitat to deteriorate and become useless - resulting in incidental take of an Endangered Species under Section 7 of the ESA. Therefore, it is our opinion that the U.S. Forest Service should request Formal Consultation and a Biological Opinion from the U.S. Fish and Wildlife Service regarding the affects of this project on the RCW.

### **3. Dept. of Transportation (DOT) field work associated with this project was inadequate.**

(A) For example, the EA does not describe what sort of surveys were carried out for the RCWs within the project area. Apparently, no new surveys were carried out on U.S. Forest Service or private land lying inside of the proposed bypass corridor. RCW assessments to evaluate impacts to foraging habitat (Appendix B) were based solely on previously known cavity trees and birds on U.S. Forest Service lands. However, the *Red-*